



December 7, 2017

Ms. Angie Vick  
Wal-Mart Stores, Inc.  
2001 SE 10<sup>th</sup> Street  
Bentonville, AR 72716

Subject: Request to Retract Off-Site Notification Letters for Continuing Obligations and Residual Contamination (Form 4400-286)  
Former Midwest Tanning Corporation Parcel  
222 North Chicago Avenue (Formerly 1200 Davis Avenue),  
South Milwaukee, WI 53172  
FID #: 241043330; BRRTS #: 02-41-556117

Dear Ms. Vick:

The Wisconsin Department of Natural Resources (DNR), has reviewed the requests from your consultant, Professional Services, Industries, Inc. (PSI), for the subject site regarding the off-site notification letters. The DNR received these requests, via e-mail on 7/27/2017; 8/23/2017; and 10/18/2017. The DNR has reviewed the case file and provided a response to each request.

The requests are intended to retract the October 2016 notification of continuing obligation and residual contamination on the off-site properties: a) the adjoining railroad right-of-way (ROW), which was related to chromium within soils, and b) the City of South Milwaukee Davis Avenue ROW, which was generally related to chromium and polynuclear aromatic hydrocarbons (PAHs). On your behalf, PSI, has tried to justify that the detected chromium was composed entirely of Trivalent-Chromium (tri-Cr) and not Hexavalent-Chromium (hex-Cr), as was present within the soil samples.

The detection of hex-Cr in the environment was reported to the DNR in 2010 when Sigma Environmental submitted the 2001 Phase II report, prepared by Hygienetics, for the site. The Phase II report did not include the analytical results and related sampling documentation, only a summary of the lab data. The two forms of chromium (tri-Cr and hex-Cr) are very different from each other in terms of their chemical structure and stability, so different sampling methods and protocols are used in the laboratory to analyze each form of chromium. The DNR has consistently requested the following laboratory documentation:

- Copy of laboratory analyses report (in .pdf format) and data interpretation
- Copy of Chain of Custody

PSI has indicated that the requested information is not available. The DNR cannot support retracting the off-site notification letters for the chromium-related contamination unless 1) the 2001 laboratory documentation can be provided, or 2) additional sampling for hex-Cr is conducted to refute the previously reported sampling results. The DNR recommends that additional investigation begins with a groundwater assessment for hex-Cr that follows the correct protocols for sampling and analysis. If hex-Cr has not migrated into the groundwater, then your consultant may be able to justify that the chromium release may have likely remained on the source property. If hex-Cr is present in the groundwater, then further sampling of the soil for hex-Cr will likely be needed.

Ms. Angie Vick  
RE: Request to Retract Off-Site Notification Letters  
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The DNR appreciates the actions you are taking to restore the environment at this site. If you have any questions regarding this letter, please contact me at 414.263.8639 or at [eric.amadi@wisconsin.gov](mailto:eric.amadi@wisconsin.gov)

Sincerely,



Eric Amadi - Hydrogeologist  
Remediation & Redevelopment Program  
Southeast Region, Milwaukee

cc: Patrick Patterson - PSI, Inc. (via email)  
SER Case File #: 241043330; BRRTS #: 02-41-556117